

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**LA UNIÓN DEL PUEBLO ENTERO, et
al.,**

Plaintiffs,

vs.

**GREGORY W. ABBOTT, et al.,
*Defendants.***

Case No. 5:21-CV-0844-XR

**MI FAMILIA VOTA; MARLA LÓPEZ;
MARLON LÓPEZ; and PAUL
RUTLEDGE**

Plaintiffs,

vs.

**GREG ABBOTT, in his official capacity as
Governor of Texas; JOSE ESPARZA, in his
official capacity as Texas Deputy Secretary
of State; WARREN “Ken” PAXTON, in his
official capacity as Attorney General of
Texas,**

Defendants.

Case No. 5:21-CV-0920-XR

**PLAINTIFFS’ INITIAL DISCLOSURES PURSUANT TO
RULE 26(A) FEDERAL RULES OF CIVIL PROCEDURE**

NOW COMES MI FAMILIA VOTA, MARLA LOPEZ, MARLON LOPEZ and PAUL
RUTLEDGE, Plaintiffs in the above-styled and numbered cause, and files Plaintiffs’ Initial
Disclosures Pursuant to Rule 26(a), F.R.C.P., as follows:

- (A) The name and, if know, the address and telephone number of each individual likely to have discoverable information- along with the subjects of that information- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

ANSWER:

Angelica Razo – contact through counsel.

Ms. Razo has knowledge of how the Mi Familia Vota voter registration and election hotline works, and how it was used in the 2020 general election in Texas to respond to calls for assistance. She served as client contact with NYU regarding report on expanding democratic access in Texas. Ms. Razo also has knowledge regarding work done in Texas by Mi Familia Vota in preparation for the 2020 election, including work done to help Black, Latino, and Asian-American Pacific Islander (“AAPI”) voters develop plans to vote. She has knowledge about training Mi Familia Vota provided to voters and poll workers regarding the lawful activities of poll watchers.

Ms. Razo has knowledge regarding Mi Familia Vota having to divert personnel, time, and resources away from its routine community activities to respond to voting changes made in SB 1, and particularly those changes that eliminate voting options that were available in the November 2020 general election. She has knowledge regarding the efforts and resources Mi Familia Vota will have to make to help lawfully registered voters monitor voter rolls to ensure that they are not incorrectly purged from the voter rolls and to assist with the costly and complicated system of reestablishing lawful registration status.

Marla Lopez – contact through counsel.

Ms. Lopez is the interim Houston Coordinator for Mi Familia Vota and a registered Harris County, Texas, voter. She intends to vote in the next election. Ms. López has knowledge regarding her personal experience voting early in the November 2020 election at a drive-through location in Harris County in the evening hours and the importance of the availability of that option for both her and her father. Ms. Lopez has knowledge regarding her own experience with voter intimidation in past elections, and its personal impact on her concern about such intimidation in the future. Ms. Lopez also has knowledge of Mi Familia Vota outreach efforts in the Houston area. She served as backup client contact with NYU regarding report on expanding democratic access in Texas.

Marlon Lopez – contact through counsel.

Mr. López is a registered Harris County, Texas, voter. He intends to vote in the next election. Mr. López has knowledge regarding his personal experience with drive-through voting in the November 2020 election, and the importance of the option of extended voting

hours that were offered to voters during the early voting period because of his long work hours and need to travel for work. Mr. Lopez has personal knowledge of his experience in elections prior to the November 2020 election when his work schedule and travel conflicted with limited voting hours, and long lines kept him from voting.

Paul Rutledge – contact through counsel.

Mr. Rutledge is a registered Montgomery County, Texas, voter. He intends to vote in the next election. Mr. Rutledge has knowledge regarding his personal experience with the challenges of voting when hours or locations are limited because he works in Harris County and commutes one hour each way. He also has knowledge regarding his personal experience with early voting options that include longer hours and weekend hours.

Ana Gonzalez – contact through counsel.

Ms. Gonzalez is a Mi Familia Vota staff member. She has knowledge regarding Mi Familia Vota's community education and community concerns around voting rights in Texas.

Anita Nunez -- contact through counsel.

Ms. Nunez is a Mi Familia Vota staff member in Texas. She has knowledge regarding Mi Familia Vota's voter registration and community education information.

Abby Gail Trino – contact through counsel

Ms. Trino is a Mi Familia Vota staff member. She has knowledge regarding Mi Familia Vota's community education and community concerns around voting rights in Texas.

Liz Magallanes – contact through counsel.

Ms. Magallanes is a former Mi Familia Vota staff member. She has knowledge regarding Mi Familia Vota's community education and community concerns around voting rights in Texas.

Isabella Bowers – contact through counsel.

Ms. Bowers is a former Mi Familia Vota Intern. She listened to Texas legislative hearings related to changes made to Texas election laws in 2021 and reported back to Mi Familia Vota.

Richard Madrigal -- contact through counsel.

Mr. Madrigal is a former Mi Familia Vota Intern. He listened to Texas legislative hearings

related to changes made to Texas election laws in 2021 and reported back to Mi Familia Vota.

Stephanie Melendez – contact through counsel.

Ms. Melendez is a former Mi Familia Vota Intern. She listened to Texas legislative hearings related to changes made to Texas election laws in 2021 and reported back to Mi Familia Vota.

Karen Martinez Perez – contact through counsel.

Ms. Martinez Perez is a former Mi Familia Vota Intern. She listened to Texas legislative hearings related to changes made to Texas election laws in 2021 and reported back to Mi Familia Vota.

Ashley Emery – contact through counsel.

Ms. Emery is an NYU graduate student consultant who analyzed the impacts of SB 1 for Mi Familia Vota. She has knowledge regarding the Capstone report identified in (B) below.

Abe Nelson – contact through counsel.

Mr. Nelson is an NYU graduate student consultant who analyzed the impacts of SB 1 for Mi Familia Vota. He has knowledge regarding the Capstone report identified in (B) below.

Javon Robinson – contact through counsel.

Mr. Robison is an NYU graduate student consultant who analyzed the impacts of SB 1 for Mi Familia Vota. He has knowledge regarding the Capstone report identified in (B) below.

- (B) A copy- or description by category and location- of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

ANSWER: Recorded calls made to voter registration and election hotline regarding voting in Texas; staff notes regarding hearings on Texas legislature voting legislation including SB7, HB6; voting outreach materials developed for Nov. 2021 election; Capstone report prepared by NYU graduate students at the request of Mi Familia Vota regarding expanding democratic access in Texas.

- (C) A computation of each category of damages claimed by the disclosing party- who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary materials, unless privileged or protected from disclosure, on which each computation is based, including materials bearing the nature and extent of the injuries suffered.

ANSWER: Not applicable. This action seeks declaratory and injunctive relief. If attorney fees and costs are recoverable, those amounts will be provided at the conclusion of the litigation.

- (D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

ANSWER: Not applicable

Respectfully submitted,

LYONS & LYONS, P.C.
237 W. Travis Street, Suite 100
San Antonio, Texas 78205
Telephone: (210) 225-5251
Telefax: (210) 225-6545

By: /s/Sean Lyons
Sean Lyons
State Bar No. 00792280
Sean@lyonsandlyons.com
Clem Lyons
State Bar No. 12742000
Clem@lyonsandlyons.com

Wendy J. Olson (*Admitted Pro Hac Vice*)
Laura E. Rosenbaum (*Admitted Pro Hac Vice*)
Marc Rasich (*Admitted Pro Hac Vice*)
Elijah Watkins (*Admitted Pro Hac Vice*)
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Telephone: (208) 387-4291
wendy.olson@stoel.com
laura.rosenbaum@stoel.com
marc.rasich@stoel.com
elijah.watkins@stoel.com

Courtney Hostetler (*Admitted Pro Hac Vice*)
John Bonifaz (*Admitted Pro Hac Vice*)
Ben Clements (*Admitted Pro Hac Vice*)
Ron Fein (*Admitted Pro Hac Vice*)
FREE SPEECH FOR PEOPLE
1320 Centre Street, Suite 405
Newton, MA 02459
Telephone: (617) 249-3015
chostetler@freespeechforpeople.org
jbonifaz@freespeechforpeople.org
bclements@freespeechforpeople.org
rfein@freespeechforpeople.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiff's Initial Disclosures Pursuant to Rule 26(A) Federal Rules of Civil Procedure has been forwarded, on this 5th day of November, 2021, to the following counsel of record:

Jeff White, Special Counsel
Office of the Attorney General
P.O. Box 12548 (MC 009)
Austin, TX 78711-2548
Jeff.white@oag.texas.gov

ATTORNEYS FOR DEFENDANTS